

1 Alison R. Kertis, Esq. (NSB 13875)  
 2 akertis@sierracrestlaw.com  
 3 Jerry C. Carter, Esq. (NSB 5905)  
 jcarter@sierracrestlaw.com  
 4 SIERRA CREST BUSINESS LAW GROUP  
 5 6770 S. McCarran Blvd., Reno, Nevada 89509  
 (775) 448-6070, Facsimile: (775) 473-8292  
*Counsel for Defendant BUILD OUR CENTER*

6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF NEVADA

8 DREW RIBAR,  
 9 v.  
 10 Plaintiff,

11 Case No. 3:24-cv-00526

12 WASHOE COUNTY; WASHOE COUNTY  
 13 LIBRARY SYSTEM; JEFF SCOTT; THANH  
 NGUYEN; JAMIE HEMINGWAY; BEATE  
 WEINERT; STACY MCKENZIE; JONNICA  
 BOWEN; BEN WEST; BUILD OUR  
 CENTER, INC.; STACEY SPAIN;  
 ANGELINE PETERSON; CHRISTOPHER  
 DANIELS; DEPUTIES ROTHKIN, SAPIDA,  
 GOMEZ; KRISTEN RYAN, JENNIFER  
 COLE; and JOHN/JANE DOES 1-10;

14 Defendants.

**DEFENDANT**  
**BUILD OUR CENTER'S**  
**REPLY IN SUPPORT OF MOTION**  
**FOR CASE MANAGEMENT**  
**CONFERENCE, RESTRAINING**  
**ORDER, AND SANCTIONS**

15  
 16  
 17 Defendant BUILD OUR CENTER INC., by and through its undersigned  
 18 counsel, respectfully files *Defendant Build Our Center's Reply in Support of Motion*  
 19 *for Case Management Conference, Restraining Order, and Sanctions* (the "Reply").

20 By filing this Reply, Build Our Center ("BOC") hereby submits *Defendant*  
 21 *Build Our Center's Motion for Case Management Conference, Restraining Order,*  
 22 *and Sanctions* (the "Motion")<sup>1</sup> [ECF 130] together with *Plaintiff's Opposition to*  
 23 *Defendant Build Our Center, Inc.'s Motion for Restraining Order and Sanctions* (the  
 24 "Opposition") [ECF 135] to the Court for decision.

25 This *Reply* is made and based upon all records and pleadings on file  
 26 herein, together with every exhibit attached hereto (each of which is incorporated  
 27

---

28 <sup>1</sup> The Motion is incorporated herein in its entirety.

1 herein by reference), as well as the points and authorities set forth directly below.

2 In support of this Reply, BOC states as follows:

3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I. INTRODUCTION**

5 In the Opposition [ECF 135], Drew Ribar (“Mr. Ribar”) either minimizes or  
 6 entirely fails to address the central issues raised in BOC’s Motion [ECF 130]. His  
 7 response is troubling and underscores his disregard for both accepted standards  
 8 of conduct and the norms expected (and required) of parties in litigation. Mr.  
 9 Ribar’s conduct continues to escalate. Despite BOC’s Motion, he has persisted  
 10 in posting online content about BOC and this litigation, vexatious filings, and  
 11 frivolous threats of Rule 11 sanctions against counsel.

12 BOC did not bring this Motion lightly. Indeed, BOC expressly warned Mr.  
 13 Ribar that if his inappropriate conduct continued, it would be compelled to seek  
 14 Court intervention. Rather than desist from his harassment and vexatious  
 15 behavior, Mr. Ribar intensified it, including flooding counsel’s inbox and  
 16 publishing online content targeting BOC volunteers and counsel. His actions  
 17 reflect not only a disregard for professional boundaries but also a pattern of  
 18 deliberately manufacturing conflict.

19 Mr. Ribar’s status as a *pro se* litigant does not exempt him from the  
 20 standards of decorum required of all parties before the Court. Accordingly, BOC  
 21 respectfully requests that the Court convene a case management conference and  
 22 impose the requested sanctions on Mr. Ribar.

23 **II. MR. RIBAR’S CONTINUED CAMPAIGN OF HARASSMENT**

24 Instead of deescalating his behavior, or acknowledging that his conduct is  
 25 out of control, Mr. Ribar has ratcheted up his litigious conduct since BOC filed  
 26 its Motion on September 18, 2025. The following illustrates his escalations:

- 27 • After counsel requested that he limit communications to U.S. Mail, he  
 28 instead filed a “Motion to Compel Electronic Service” [ECF 131].

- He continues to post inflammatory statements about this litigation on social media, including accusing BOC and government officials of “corruption” and conspiring to interfere with his political campaign. See **Exhibit 1** – Facebook Post Scott Hoen. See **Exhibit 2** – Facebook Post re political “banned list”
- He has filed multiple unnecessary and vexatious pleadings, including a “Motion to Strike,” a “Supplemental Opposition” requesting an irrelevant and unnecessary evidentiary hearing, and a “Supplemental Notice of Evidence” alleging coordinated misconduct by defense counsel and Washoe County.
- Ignoring BOC’s directive, he emailed counsel directly on September 22, 2025, demanding evidence preservation concerning an event in which BOC had no involvement. A true and correct copy of that September 22, 2025, 8:23 p.m. email is attached hereto as **Exhibit 3**.
- On social media, he continues to accuse BOC of violating IRS regulations, despite lacking standing to assert such claims, and encourages hostile commentary. See **Exhibit 4** – Greater Reno Facebook Post. See **Exhibit 5** – Facebook Post Comments re “Banned List.” See concerning comments to this post, attached hereto as **Exhibit 6** (“If I ever go back to Reno maybe I’ll look them up. I don’t like them much.”).
- He further circulates posts and videos accusing BOC and other government officials of “banning” political candidates from events. See **Exhibit 7** – Facebook post with link to UNR police video.
- Mr. Ribar published a video concerning this litigation—titled “Lawyer Lies to Judge,”<sup>2</sup> directly targeting Counsel Kertis and the owner of

---

<sup>2</sup> <https://www.youtube.com/watch?v=o7m04Gzn-yo&t=1615s>

1 Sierra Crest Business Law Group, Jerry Carter, Esq.—and urges his  
 2 followers to preserve copies of his video in anticipation of a potential  
 3 court order requiring its removal. This video has a host of alarming  
 4 comments.

- 5 • Mr. Ribar published a video entitled “Banned & Running for Office”<sup>3</sup>  
 6 claiming BOC put together a “banned list” to preclude him from  
 7 running from office and “used the Reno Police Department” to ban him  
 8 from Pride 2025. This also includes posted information about BOC  
 9 board member, Alan Ratliff, and BOC volunteer YeVonne Allen.

10 **III. LEGAL ARGUMENT**

11 **a. BOC Did Not Bring its Motion Under FRCP Rule 11**

12 As a preliminary matter, BOC did not bring its Motion under FRCP Rule  
 13 11. Mr. Ribar claims “Rule 11 requires a motion for sanctions to be served at  
 14 least 21 days before filing, to allow withdrawal or correction.” [ECF 135 at p. 2.]  
 15 BOC brought its Motion based on this Court’s inherent authority, Mr. Ribar’s  
 16 bad faith conduct, and Local Rule IA 11-8(c).

17 “The right of self-representation is not a license to abuse the dignity of the  
 18 courtroom. Neither is it a license not to comply with relevant rules of procedural  
 19 and substantive law.” *McKaskle v. Wiggins*, 104 S. Ct. 944, 954 (1984) (citing  
 20 *Faretta v. California*, 95 S. Ct. 2525, 2541 (1975) n.46). Likewise, *pro se* litigants  
 21 are also subject to Rule 11 sanctions. See *Business Guides v. Chromatic*  
 22 *Communications, Enterprises*, 892 F.2d 802, 811 (9th Cir. 1989), *aff’d* 498 U.S.  
 23 533, 111 S. Ct. 922, 112 L.Ed.2d 1140 (1991) (“Pro se litigants are subject to  
 24 Rule 11 sanctions and their filings, like those of attorneys, are judged by an  
 25 objective standard of reasonableness.”).

26 / / /

---

27  
 28 <sup>3</sup> <https://www.youtube.com/watch?v=Pdurb2VG0-E>

1       *Pro se* status does not exempt individuals from adhering to procedural  
 2 rules, ethical obligations, or decorum requirements. *Pro se* litigants are also held  
 3 to the same standard of decorum and ethical conduct expected of attorneys, both  
 4 inside and outside the courtroom. *See Kulas v. Flores*, 255 F.3d 780, 787 (9th  
 5 Cir. 2001). “The court expects a high degree of professionalism and civility from  
 6 attorneys.” LR 1-1(c). This expectation applies to attorneys “when appearing  
 7 before the court and when engaged outside of it, whether in discovery or any  
 8 other phase of a case.” *Id.* Additionally, courts are guided by Federal Rules of  
 9 Civil Procedure 1 to ensure a “just, speedy, and inexpensive determination of  
 10 every action and proceeding.” “The Federal Rules of Civil Procedure were  
 11 amended to highlight the need for attorneys to work cooperatively and to employ  
 12 common sense practicability so that cases can be resolved fairly and  
 13 expeditiously. *Searcy v. Esurance Ins. Co.*, No. 2:15-cv-00047-APG-NGK, 2016  
 14 WL 4149964, at \*2 (D.Nev.Aug. 1, 2016).

15       Federal courts have inherent authority to sanction conduct abusive of the  
 16 judicial process, including against *pro se* litigants for harassing and vexatious  
 17 conduct. *See Chambers v. NASCO, Inc.*, 501 U.S. 32, 43-46 (1991). For example,  
 18 in *Missud v. Nevada*, 861 F. Supp. 2d 1044, 1060 (N.D. Cal. 2012), *aff’d*, 520  
 19 Fed. Appx. 534 (9th Cir. 2013), the court found that the *pro se* litigant’s intent  
 20 to harass opposing counsel and impose financial burdens through litigation  
 21 warranted a designation as a vexatious litigant. In part, the court noted that  
 22 plaintiff’s conduct was frivolous and harassing because, instead of abandoning  
 23 his claims after being sanctioned, the plaintiff “simply ratcheted up his litigious  
 24 conduct in the aftermath” of the Court’s ruling. *Id.* The plaintiff’s  
 25 communications, which included threats to make litigation “horrendously  
 26 expensive” and publicize the case to embarrass the defendant, demonstrated  
 27 improper motives under Rule 11(b)(1), which prohibits filings made for  
 28 harassment or other improper purposes. *Id.*; *see also Eng v. Marcus & Millichamp*

1 Co., No. C 10-05050 CRB, 2011 WL 2175207, at \*2 (N.D.Cal. June 3, 2011)  
 2 (declaring plaintiff a vexatious litigant because he had sent threatening emails  
 3 to defendants as probative of his “improper purpose of harassing Defendants”).  
 4 Similarly, in *DeNardo v. Johnstone*, A90-001 CIV, 1991 WL 183814 (D. Alaska  
 5 1991), the court noted that a *pro se* litigant’s pattern of using litigation to harass  
 6 those he disliked, by forcing them to incur legal costs, justified awarding attorney  
 7 fees under 42 U.S.C. § 1988 to the prevailing defendants; the *pro se* litigant’s  
 8 conduct was deemed an abuse of the judicial process.<sup>4</sup> *Pro se* litigants are also  
 9 held to the same standard of decorum as attorneys

10 The court may, after notice and an opportunity to be heard, impose  
 11 appropriate sanctions on a party who fails to comply with the Court’s Local  
 12 Rules. LR IA 11-8(c). Recklessness, when combined with an additional factor  
 13 such as frivolity, harassment, or an improper purpose may support sanctions.  
 14 See *in re Giardi*, 611 F.3d 1027, 1061 (9th Cir. 2010). “[S]anctions are available  
 15 if the court specifically finds bad faith or conduct tantamount to bad faith.” *Fink*  
 16 *v. Gomez*, 239 F.3d 989, 994 (9th Cir. 2001); see also *In re Cashion Family Tr.*,  
 17 669 B.R. 341, 382 (Bankr. D. Nev. 2025) (“Federal courts have inherent power  
 18 to fashion an appropriate sanction for conduct ‘which abuses the judicial  
 19 process.’” (citing *Barker v. U.S. Nat. Bank*, 2015 WL 1622098, at \*5 (D. Or. Apr.  
 20 9, 2015)).

21 **b. Mr. Ribar Minimizes Serious and Inappropriate Conduct**

22 Mr. Ribar ignores the core issues raised in BOC’s Motion, including his  
 23 escalating and alarming conduct during the weeks of September 8 to 15, 2025.

---

24 <sup>4</sup> Of particular note, the Court awarded attorneys’ fees and costs to the prevailing  
 25 defendants and against the *pro se* litigant because the *pro se* litigant knew or  
 26 should have known his case was without merit, and that “any lay person,  
 27 having read all of the decisions rendered against [the *pro se* litigant] would have  
 28 recognized that [the] lawsuit was groundless and that he would be subject to  
 an adverse award of attorneys’ fees under 42 U.S.C. § 1988. This would be true  
 even if [the *pro se* litigant] was so invincibly ignorant that he was proceeding in  
 good faith.” *DeNardo*, A90-001 CIV, 1991 WL 183814 (D. Alaska 1991)

1 During those weeks, he unleashed a barrage of emails and videos falsely  
2 accusing BOC of excluding him from its private September 6 event, disregarded  
3 BOC's request that he cease contact with its employees, board members, and  
4 volunteers and compounded his behavior with baseless threats of Rule 11  
5 sanctions and meritless allegations of IRS violations—claims he has no authority  
6 to pursue or enforce. [See ECF 130 at pp. 7-10.] Counsel for BOC declined to  
7 litigate these issues with Mr. Ribar over email [see ECF 130-22] and cautioned  
8 him that if he continued to engage in harassment and vexatious behavior, BOC  
9 would file the instant Motion. [ECF 130-16; ECF 130-18.] Mr. Ribar, driven (and  
10 deluded) by unfounded conspiracy theories, launched into more baseless  
11 attacks, accusing Counsel Kertis of being a “liar” based on alleged  
12 communications with UNR police. [See Doc. 130 at pp. 10-12]. During these two  
13 weeks of alarming escalation, Sierra Crest Business Law Group employees  
14 observed a man loitering in the firm’s private parking lot on two consecutive  
15 days—behavior unusual and concerning enough to prompt reports to  
16 management. [See ECF 130-6 and 130-7.] Mr. Ribar’s recent escalation,  
17 including confronting Dr. Alan Ratliff and YeVonne Allen at their workplaces,  
18 coupled with the sightings of Mr. Ribar loitering at Sierra Crest Business Law  
19 Group, caused the same to fear for the safety of its staff and counsel. [See ECF  
20 130 at pp. 12-13.] This was a real and immediate threat, not imagined or  
21 exaggerated. So much so, that Counsel Kertis was forced to alert her neighbors,  
22 family, and young children’s daycare of the immediate danger. [See ECF 130-8.]  
23 In response, Sierra Crest Business Law Group sent Mr. Ribar a formal letter  
24 demanding that he refrain from trespassing on the property, or from  
25 communicating with staff or attorneys by electronic communication or over the  
26 telephone. [See ECF 130-8.] Mr. Ribar’s conduct was so alarming that Sierra  
27 Crest Business Law Group was compelled to implement security measures to  
28 protect its staff and counsel. The fear and concerns his actions caused were real

1 and palpable, not imagined, and demanded a serious, proactive response.

2 Mr. Ribar ignores both the objective facts and the serious danger he has  
 3 created through his vexatious litigation and toxic online content. Rather than  
 4 address his escalation, he disputes and attempts to gaslight, Sierra Crest's  
 5 employees' observations of him loitering on the property, claiming Google Maps  
 6 places him elsewhere on September 15-16, 2025. This so-called evidence is  
 7 highly unreliable: such types of location applications/platforms can be altered,  
 8 deleted, or controlled by another person, contains no raw geolocation data, lacks  
 9 authentication, and is often inaccurate. In short, it does not refute what Sierra  
 10 Crest employees witnessed or experienced.

11 BOC brought its Motion for precisely the reasons reflected in Mr. Ribar's  
 12 own Objection: he continues to ignore that his escalating conduct created a very  
 13 real and present fear for BOC and Sierra Crest. He also disregards that his online  
 14 content is toxic, fuels escalating harmful behavior in others, and actively  
 15 encourages further hostility.

16 Under any other circumstances, were Mr. Ribar an attorney, his conduct  
 17 would warrant sanctions, reprimand or even disbarment.

18 **CONCLUSION**

19 Based on BOC's Motion [ECF 130] and the above Reply, BOC respectfully  
 20 requests that this Court hold an emergency case management conference and  
 21 not only admonish Mr. Ribar to proceed with civility and professionalism, but  
 22 also sanction him as follows:

23 **1.** Mr. Ribar should be enjoined, restrained, and prohibited from  
 24 physically approaching (not to come within 600 feet), speaking to,  
 25 and sending any type of written communication (including on any  
 26 social media platform) to any member or volunteer of Build Our  
 27 Center;

28 / / /

1           **2.** If Mr. Ribar wants to make a public records request, he is  
2 prohibited from making this request directly to any person from  
3 Build Our Center, its board members, employees, or volunteers; he  
4 must make his public records requests over the telephone or online;

5           **3.** Mr. Ribar should be enjoined, restrained, and prohibited from  
6 physically approaching (not to come within 600 feet), speaking to,  
7 and sending any type of electronic or telephonic communication  
8 (including on any social media platform) to any employee of Sierra  
9 Crest Business Law Group. All communication with the law firm  
10 shall be through the U.S. Mail;

11           **4.** Mr. Ribar should be enjoined, restrained, and prohibited from  
12 continuing to post content from this litigation on any social media  
13 page, including but not limited to: YouTube, Facebook, Instagram,  
14 LinkedIn, Twitter, X, Truth Social, and TikTok. Any content as to  
15 this litigation currently on any of his social media pages shall be  
16 removed immediately;

17           **5.** Mr. Ribar shall remove any and all references to Alison R.  
18 Kertis, Esq. on his social media platforms, including but not limited  
19 to: Facebook, Instagram, LinkedIn, Twitter, X, Truth Social, and  
20 TikTok;

21           **6.** Mr. Ribar shall reimburse counsel for BOC the cost of her  
22 purchase of a home security system to protect against his stalking  
23 and harassment (the receipt for which is attached to the Motion as  
24 Exhibit 9 [ECF 130-9]; and

25           **7.** Mr. Ribar shall be responsible for paying all attorneys' fees  
26 and costs incurred in defending against this most recent vendetta,  
27 including but not limited to, attorneys' fees and costs beginning on  
28 September 26, 2025, through the present.

**8.** For any and all other relief the Court deems appropriate under the circumstances.

DATED September 30, 2025. SIERRA CREST BUSINESS LAW GROUP

/s/ Alison R. Kertis, Esq.  
By: \_\_\_\_\_

1                    **CERTIFICATE OF SERVICE**

2                    I certify that I am an employee of the SIERRA CREST BUSINESS LAW  
3 GROUP who, on the below-written date, caused a true copy of the foregoing to  
4 be transmitted via email and also to be filed using the above-entitled Court's  
5 electronic filing (CM/ECF) system which will automatically e-serve the same) on  
6 the person(s) and/or entity(ies) set forth directly below:

7  
8                    **Drew Ribar**  
9                    480 Pershing Lane, Washoe Valley, NV 89704  
10                  (775) 223-7899  
11                  const2audit@gmail.com  
12                  *Plaintiff in propria persona*

13                  **Lindsay L. Liddell** (SBN 14079)  
14                  **Andrew Cobi Burnett** (SBN 16505)  
15                  DEPUTY DISTRICT ATTORNEYS  
16                  One South Sierra Street Reno, NV 89501  
17                  lliddell@da.washoecounty.gov  
18                  cburnett@da.washoecounty.gov  
19                  (775) 337-5700  
20                  *Counsel for Plaintiffs Washoe County and its Library  
21 System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen,  
22 Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida,  
23 and Sgt. George Gomez*

24                  DATED: September 30, 2025.

25                  /s/ *Monica R. Leazer*

26                  \_\_\_\_\_  
27                  an employee of the  
28                  SIERRA CREST BUSINESS LAW GROUP

## **INDEX OF EXHIBITS**

to

DEFENDANT BUILD OUR CENTER'S  
REPLY IN SUPPORT OF MOTION FOR  
CASE MANAGEMENT CONFERENCE,  
RESTRAINING ORDER, AND SANCTIONS

re

*Ribar vs. Washoe County, et alia*  
(Case No. 3:24-cv-00526)

Exhibit No.	Exhibit Description	Pages (+ Cover)
1.	Facebook Post re Scott Hoen	2
2.	Facebook Post re Political “Banned List”	2
3.	09/22/2025 8:23 pm Email re Evidence Preservation	3
4.	Facebook Post re Greater Reno	2
5.	Comments to Facebook Post re “Banned List”	2
6.	Concerning Comments to Facebook Post re “Banned List”	2
7.	Facebook Post with Link to UNR Police Video	